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| Policy Custodian: | | **EDI Officer** | | | |
| Policy Champion: (if applicable) | | **All Members of the Senior Leadership Team** | | | |
| This document also relates to the following St Basils policies, procedures, and guidelines: | | | | | |
| * Confidentiality Policy * Health & Safety Policy * Safeguarding Policy * Anti-Social Behaviour Policy * Recruitment and Selection Policy * Whistleblowing Policy * Reasonable Adjustments & Special Considerations Policy * Complaints, Comments, and Compliments Policy * Code of Conduct | | | * Eviction and Abandonment Policy * Allocations and Referrals Policy * Assessment and Support Planning Policy * Dignity and Respect Policy * Learning and Development Policy * Disciplinary Policy * Grievance Policy * EDI Action Plan * RACE Equality Code of Governance Action Plan | | |
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# Equality, Diversity & Inclusion Policy

## Policy Statement

St Basils is committed to fostering an inclusive environment for employees, young people and all stakeholders, one that is free from all forms of discrimination and where diversity, equity, equality and inclusion are actively embraced. We are dedicated to delivering the highest standard of support to every young person, ensuring our services are fair, inclusive, and appropriate for each individual and their needs. Equally, St Basils is committed to creating a workplace culture in which all employees feel valued, supported, and treated equitably. We strive to provide meaningful employment opportunities, promote inclusive practices, and empower staff to contribute fully to the organisation’s mission.

Our strategic priority ‘Challenging discrimination and promoting equality, diversity, inclusion and cohesion through employment, service delivery and community engagement’, demonstrates our commitment to providing a safe, supportive environment where young people and staff can grow, thrive, and have their wellbeing protected. As part of this commitment, we provide training and development opportunities that address key issues affecting individuals with protected characteristics. A key example is the introduction of our Anti-Racism training, which is mandatory for all staff and Board members and is an essential component in our commitment to anti-racism.

## Scope of Policy

This policy applies to the governance of St Basils, all employees, in all departments and services and Board members as well as young people whether or not they are St Basils’ residents and/or support service users.

For the purposes of this policy the term ‘employee’ will include all employees (whether full time or part time), volunteers, casual workers and contracted workers.

The scope of this policy also includes suppliers of goods and services, partner organisations and the wider community.

## Definitions

**Equality** means access or provision of equal opportunities, where individuals are protected from being discriminated against in regard to age, disability, sex, gender reassignment, pregnancy and maternity, race, religion or belief, marriage and civil partnership and sexual orientation. These are the nine protected characteristics as identified in the Equality Act 2010. Additionally, St Basils has recognised 'care leaver' status as a protected characteristic, aligning with Birmingham City Council’s decision to do the same. We also understand and respect that there can be differences between assigned sex and gender identity and expression, and we value the unique contribution of all employees, young people and partners, including individuals who identify outside of the gender binary.

This means equal rights for people regardless of any aspect of their identity, unhampered by prejudices or preferences, eliminating discrimination and any issues which could result in less favourable treatment to an individual or group of individuals. Equality is about creating a fair and inclusive environment where everyone can participate and has the same opportunity to fulfil their potential.

**Diversity** is about recognising, valuing and taking account of people's different backgrounds, knowledge, skills, and experiences, and encouraging and using those differences to create a productive, effective and inclusive community and workforce where everyone feels valued.

**Inclusion** is the practice of creating an environment where all individuals feel welcomed, respected, supported, and able to fully participate. It ensures that diverse voices are heard and valued, and that barriers, whether cultural, structural, or social, are removed so everyone has equal opportunities to contribute and succeed. At St Basils this means that we strive to have an **inclusive** environment first and foremost, ‘where everyone feels able to participate and achieve their potential’ (CIPD).

**Equity** means recognising that people have different needs, circumstances, and barriers, and therefore providing fair and tailored support to ensure everyone has an equal opportunity to succeed. Unlike equality, which treats everyone the same, equity involves taking steps to address imbalances and remove obstacles so that all individuals can achieve their full potential.

## Legislation and Guidance

A wide range of legislation and regulations govern equality and diversity. This is designed not only to ensure compliance with these legal requirements but also to promote adherence to current standards of good practice. The key Legislation and Codes of Practice that have informed the development of this policy are listed below:

The Equality Act 2010 ([see appendix 3](#_Appendix_3_-)) or go to: [**www.gov.uk/equality-act-2010-guidance**](http://www.gov.uk/equality-act-2010-guidance)

The Housing Act 2004 (Gypsies and Travelers)

The Human Rights Act 1998 ([see appendix 4](#_Appendix_4_-)) or go to: [**www.equalityhumanrights.com**](http://www.equalityhumanrights.com)

The Equal Pay Act 1970

The Employment Rights Act 1996

The Disability Discrimination Act 1995

The Gender Recognition Act 2004

Equality and Human Rights Commission Codes of Practice

Regulatory Framework of Social Housing in England

The Social Housing (Regulation) Act 2024 – Consumer Standards

The Data Protection Act 2018 (inc.UK GDPR)

National Housing Federation Code of Governance 2020

The RACE Equality Code of Governance 2020

## General Principles

This policy is designed to support St Basils in creating a productive, effective and inclusive environment and workforce, one which is free from discrimination and where everyone is respected and all feel valued.  
 **We aim to do this by:**

* Being an employer of choice for people from diverse backgrounds and experiences.
* Building a workforce at all levels which reflects the diversity of the wider community we serve.
* Responding effectively to the diverse needs of young people who are homeless or at risk.
* Complying fully with all relevant current legislation.
* Collecting and reviewing equalities data on employees and young people to identity any groups we may not be reaching or who may be receiving unequal service or opportunities.
* Ensuring no individual or group experiences less favourable treatment by considering all protected characteristics and key human rights and investigating any reported incidents thoroughly to understand contributing factors.
* Providing equality of opportunity and fair treatment for all.
* Making reasonable adjustments to working arrangements and premises to ensure equal access for young people, employees or potential employees, with particular needs or disabilities ([see appendix 5](#App5)).
* Preventing disadvantage caused by unjustified conditions or requirements.
* Educating our young people about their rights and responsibilities under the Equality Act, in line with this policy.
* Involving young people in activities to broaden their understanding and appreciation of diverse cultures and backgrounds.
* Ensuring young people learn to respect differences and have opportunities to live and work in a n environment they value.
* Creating a living environment that is safe, secure and free from discrimination, one where our young people can thrive and develop and have their welfare fully protected*.*
* Building positive and trusting relationships with local communities through effective engagement, proactively addressing concerns, and encouraging support for local schemes and young people.
* Implementing Equality Impact Assessments to monitor the effectiveness of our policies and processes on different groups.

Young people who are concerned about breaches of this policy ([see appendix 1](#_Appendix_1_-)) can seek redress through the Complaints, Compliments and Comments policy and procedures. In relation to young people, breaches of their Licence Agreement referring to Equality and Diversity, may lead to warnings, sanctions or possible eviction.

Employees have a duty to safeguard young people from abuse, including discrimination and harassment, under St Basils Safeguarding Policy and Procedures. If an employee or trainee feels they have been discriminated against ([see appendix 2](#_Appendix_2_-)), they should seek redress through the organisation’s Dignity and Respect Policy and Procedures. Misconduct and breaches of this policy may lead to disciplinary action, including dismissal.

Volunteers and Partners should use St Basils’ Complaints, Compliments and Comments Policy to raise concerns. Breaches of this policy by partners or service providers may lead to termination of contracts or service agreements.

## Roles and Responsibilities

At St Basils, we are committed to fostering an inclusive and equitable workplace and service environment. We expect all employees to actively support and uphold the principles of EDI.

St Basils is committed to:

* Providing equitable access to training, development and career progression opportunities for all employees. We will monitor uptake and use this data to identify underrepresented groups, addressing any disparities to ensure fair access for all.
* Delivering induction, EDI training and ongoing development opportunities for all employees to enhance awareness of the organisation’s diversity goals and the practical implementation of EDI principles. Attendance at initial and refresher training is mandatory for all staff.
* Ensuring that we use employee feedback to evaluate and continuously improve the effectiveness and delivery of training opportunities.
* Reporting, including in St Basils’ annual report, progress in meeting EDI obligations, such as the Gender and Ethnicity pay gaps. These reports will also outline our forward plans for supporting employees and young people from all backgrounds.
* Ensuring robust procedures are in place to support employees, young people and partners who wish to raise concerns or complaints about discrimination or unfair treatment.
* Using data to identify gaps in service access and remove barriers to access. This includes proactive recruitment practices such as advertising on diverse job boards, conducting community outreach, and promoting representation across the organisation.
* Prioritising the voices and needs of young people in shaping and delivering services. Feedback and engagement will be meaningfully integrated into how services are designed and delivered.

All St Basils employees are expected to:

* Actively support and promote the organisation’s commitment to Equality, Diversity and Inclusion
* Value and respect individual differences and recognise the contributions of all our young people, employees and partners.
* Create and maintain an environment where everyone is treated with dignity and respect. This includes addressing structural or institutional barriers and working towards removing inequalities.
* Promote a culture where intimidation, bullying and harassment are not tolerated, with clear consequences for breaches of this principle.
* Foster a safe and inclusive space where individuals feel confident and supported to raise or challenge incidents of discrimination.
* Lead by example in their language and behaviour, demonstrating respect for all and actively opposing any conduct or attitudes that degrade, harm, or promote hostility toward others.

## Training Requirements

Provision of regular and appropriate training for all board members and employees to raise awareness of equal opportunities and diversity issues will be provided. EDI training and Anti-Racism training are mandatory for all employees and board members.

## Communication

This policy will be communicated effectively to all employees via a range of different media avenues and can be produced in other formats where needed.

## Policy Responsibility

The Board of Directors and Senior Leadership Team of St Basils have approved this policy and have overall responsibility for its implementation and effectiveness.

The day-to-day implementation of this policy is the responsibility of all line managers, with support available from the EDI Officer.

All employees, partners and young people in receipt of services are expected to uphold both the spirit and intent of this policy.

The policy will be implemented by:

* An annual review of current practices to identify areas for improvement. This will be collated in the form of an EDI Action Plan for the Senior Leadership Team (SLT), supported by the external RACE Equality Code Action Plan developed by RSM.
* The active contribution of young people in the designing of standards, monitoring services and identifying priorities related to equality, diversity and inclusion.
* Providing adequate resources to implement and monitor the policy, overseen by the SLT and the Board.
* Developing positive action initiatives where appropriate, overseen by the Senior Leadership Team.
* The SLT monitoring progress, reporting regularly to the Board of Directors, and reviewing the policy periodically to ensure ongoing relevance and effectiveness.

## Continuous Renewal Clause

This procedure will be reviewed every 2 years by the organisation to ensure it is in accordance with good practice guidance, prevailing legislation and statutory frameworks. However, this policy may be assessed before that time as necessary – such as:

* if it becomes ineffective
* to reflect substantial changes in practice
* following inspection, as recommended by auditors
* or changes required by law

## Disclaimer

This document can only be considered valid when viewed on the St Basils Workplace/Shared: Drive. If this document has been printed or saved to another location, you must check that the version number on your copy matches that of the document online. Hard copies of this document are considered uncontrolled - please refer to the St Basils Workplace for latest version.

## Appendix 1 - How you can be discriminated against

Discrimination can take many forms; some examples are detailed below:

* Direct discrimination - treating someone less favourably because they have a protected characteristic
* Indirect discrimination - applying policies or practices that appear neutral but disadvantage individuals with a protected characteristic
* Harassment - unwanted conduct related to a protected characteristic that violates a person’s dignity or creates a hostile environment
* Victimisation - treating someone unfairly because they have made or supported a complaint about discrimination or harassment

You are legally protected against discrimination under the Equality Act 2010 in the following areas:

* In the workplace
* In education
* As a consumer
* When using public services
* When buying or renting property
* As a member or guest of a private club or association

You’re also protected from discrimination if:

* You are associated with someone who has a protected characteristic, e.g. a family member or friend
* You have made or supported a complaint about discrimination

**Positive discrimination** (treating someone more favourably solely because of a protected characteristic) is **unlawful**.

**Positive action** may be **lawful** if it is a proportionate way to:

* Overcome or reduce disadvantage
* Meet different needs
* Encourage participation in a particular activity

The Equality Act 2010 allows employers to take positive action when it can be objectively justified.

## Appendix 2 - Discrimination at work

It is illegal to treat someone less favourably than others because of a personal characteristic protected under the Equality Act 2010.

Examples of unlawful discrimination at work:

* Not hiring a qualified candidate
* Selecting a particular person for redundancy based on a protected characteristic
* Paying someone less than another worker without objective justification

Discrimination does not need to be intentional. **Indirect discrimination** can occur through workplace policies or practices that disproportionately disadvantage a particular group.

If you think you’ve been unfairly discriminated against you can:

* Address it directly to the individual involved, explaining that their behaviour is offensive or inappropriate. This informal approach is often effective, especially if the behavior was unintentional.
* Discuss the matter with your line manager or raise concerns through another internal channel.
* Seek redress through the organisation’s Dignity and Respect Work Policy and Procedures.
* Seek advice and support through an external organisation.

Examples of external organisations:

St Basils Employment Assistance Programme

Citizens Advice Bureau

[Equality Advisory Support Service](https://www.gov.uk/equality-advisory-support-service) [www.equalityadvisoryservice.com](http://www.equalityadvisoryservice.com)

## Appendix 3 - Equality Act 2010

**The Equality Act came into force on 1 October 2010, providing protection by law from discrimination on the basis of 'protected characteristics'.** **The Equality Act 2010 legally protects people from discrimination in the workplace and in wider society.**

**It replaced previous anti-discrimination laws with a single Act, making the law easier to understand and strengthening protection in some situations. It sets out the different ways in which it’s unlawful to treat someone.**

We recognise that under current equalities legislation people are protected against discriminatory and unfair service provision based on the following characteristics:

* Age
* Disability
* Sex
* Gender Re-assignment
* Pregnancy & Maternity
* Race
* Religion or Belief
* Sexual Orientation
* Marriage and civil partnership
  + (This is a protected characteristic within Employment Law)

**These are called ‘protected characteristics’.**

**Definitions of the ten protected characteristics (nine in line with the Equality Act and one voluntarily adopted by St Basils):**

**Age**

Refers to a particular age or range of ages. People who fall within the same age group are considered to share the protected characteristic of age.

**Disability**

In the Act, a person has a disability if they have either physical or mental impairment and the impairment has a substantial and long-term adverse effect on their ability to perform normal day-to-day activities.

**Sex**

For the purposes of the Act, sex means being a man or a woman. Men share the sex characteristic with other men and women with other women.

**Gender Reassignment**

This is defined for the purpose of the Act as where a person has proposed, started or completed a process to change his or her sex. In the Equality Act (2010) a transsexual person has the protected characteristic of gender reassignment. A woman making the transition to being a man and a man making the transition to being a woman both share the characteristic of gender reassignment, as does a person who has only just started out on the process of changing his or her sex and a person who has completed the process.

Use of the term ‘transexual’ has been criticised for its origins in psychological and medical communities and its association with undergoing gender-affirming medical procedures. St Basils prefers to use the term ‘transgender’ and the umbrella term ‘trans’ to describe people whose gender is different from the gender assigned to them at birth. St Basils also believes in the right of people to self-identity (e.g. as with no gender, or non-binary).

**Pregnancy and Maternity**

This is defined for the purpose of the Act as where a woman is protected against discrimination on the grounds of pregnancy and maternity during the period of her pregnancy and any statutory maternity leave to which she is entitled.

**Race**

For the purposes of the Act, 'race' includes colour, nationality and ethnic or national origins.

People who have or share characteristics of colour, nationality or ethnic or national origins can be described as belonging to a particular racial group.

**Religion or Belief**

This covers people with religious or philosophical beliefs and includes those with non-religious beliefs. To be considered a religion within the meaning of the Act, it must have a clear structure and belief system.

To be considered a philosophical belief for the purposes of the Act, it must be genuinely held, be a belief and not an opinion or viewpoint, be a belief as to a weighty and substantial aspect of human life and behaviour, attain a certain level of cogency, seriousness, cohesion of importance, and be worthy of respect in a democratic society, compatible with human dignity and not conflict with fundamental rights of others.

**Sexual orientation**

This is defined in the Act asa person’s sexual orientation towards:

People of the same sex as him or her (in other words the person is a gay man or a lesbian)

People of the opposite sex from him or her (the person is heterosexual)

People of both sexes (the person is bisexual)

People sharing a sexual orientation means that they are of the same sexual orientation and therefore share the characteristics of sexual orientation.

**Marriage and Civil Partnerships**

This refers to people who have the common characteristic of being married or of being civil partners.

People who are not married or civil partners do not have this protected characteristic

A person who is engaged to be married is not married and therefore does not have this protected characteristic

A divorcee or a person whose civil partnership has been dissolved is not married or in a civil partnership and therefore does not have this protected characteristic

**Care Leavers**

Care Leavers are not currently recognised as a protected characteristic under the Equality Act 2010. However, in line with Birmingham City Council’s decision to recognise it, St Basils has voluntarily adopted Care Leaver status as an additional protected characteristic for the purposes of promoting equity and inclusive service provision.

**For further information regarding the Equality Act and the recognized characteristics go to:**

Discrimination: your rights - GOV.UK (www.gov.uk)

## Appendix 4 - The Human Rights Act 1998

The Human Rights Act 1998 came into force in the United Kingdom in October 2000. It is composed of a series of sections that have the effect of codifying the protections in the European Convention on Human Rights into UK law.

The rights covered within this act include:

* [Right to life](http://www.equalityhumanrights.com/human-rights/what-are-human-rights/the-human-rights-act/right-to-life/)
* [Freedom from torture and inhuman or degrading treatment](http://www.equalityhumanrights.com/human-rights/what-are-human-rights/the-human-rights-act/protection-from-torture-and-mistreatment/)
* [Right to liberty and security](http://www.equalityhumanrights.com/human-rights/what-are-human-rights/the-human-rights-act/right-to-liberty-and-security/)
* [Freedom from slavery and forced labour](http://www.equalityhumanrights.com/human-rights/what-are-human-rights/the-human-rights-act/protection-from-slavery-and-forced-labour/)
* [Right to a fair trial](http://www.equalityhumanrights.com/human-rights/what-are-human-rights/the-human-rights-act/right-to-a-fair-trial/)
* [No punishment without law](http://www.equalityhumanrights.com/human-rights/what-are-human-rights/the-human-rights-act/no-punishment-without-law/)
* [Respect for your private and family life, home and correspondence](http://www.equalityhumanrights.com/human-rights/what-are-human-rights/the-human-rights-act/respect-for-your-private-and-family-life/)
* [Freedom of thought, belief and religion](http://www.equalityhumanrights.com/human-rights/what-are-human-rights/the-human-rights-act/freedom-of-thought-belief-and-religion/)
* [Freedom of expression](http://www.equalityhumanrights.com/human-rights/what-are-human-rights/the-human-rights-act/freedom-of-expression/)
* [Freedom of assembly and association](http://www.equalityhumanrights.com/human-rights/what-are-human-rights/the-human-rights-act/freedom-of-assembly-and-association/)
* [Right to marry and start a family](http://www.equalityhumanrights.com/human-rights/what-are-human-rights/the-human-rights-act/right-to-marry/)
* [Protection from discrimination in respect of these rights and freedoms](http://www.equalityhumanrights.com/human-rights/what-are-human-rights/the-human-rights-act/protection-from-discrimination/)
* [Right to peaceful enjoyment of your property](http://www.equalityhumanrights.com/human-rights/what-are-human-rights/the-human-rights-act/protection-of-property/)
* [Right to education](http://www.equalityhumanrights.com/human-rights/what-are-human-rights/the-human-rights-act/right-to-education/)

This list and explanations of these rights and how they could be interpreted in the workplace can be found at Equality & Human Rights Commission website at:

[www.equalityhumanrights.com/human-rights](http://www.equalityhumanrights.com/human-rights)

**The human rights-based approach is the process by which human rights can be protected by adherence to underlying core values of fairness, respect, equality, dignity and autonomy, or FREDA.**

Examples of how these may apply to St Basils workplace and services is shown in the table on the page below

Table 1: Examples of how **FREDA** apply to St Basils workplace and services

|  |  |
| --- | --- |
| **Principle** | **What it means to us** |
| **Fairness** | *That employees and young people are treated – and treat others – fairly and understand what to do if they feel that this is not the case.*  *That consideration is given to an individual’s opinion, giving them the opportunity to have that point of view expressed, listened to and considered when decisions are being taken.*  *That we have effective policies in place and employees are sufficiently competent and confident to respond to concerns and incidents raised by colleagues and young people.* |
| **Respect** | *Employees and young people’s religious; cultural and lifestyle needs are taken into account.*  *That we actively encourage and promote understanding of different cultural and lifestyles across our service user and employees’ groups.*  *That we create an environment which is inclusive and in which individual differences and contributions are recognised and valued.*  *Risk assessments are carried out appropriate to the young person’s needs.* |
| **Equality** | *That employees and young people have the opportunity to live and work in a way that they would choose and value.*  *To create an environment that is free from discrimination off any sort.*  *That policies and procedures are in place to protect everyone from being treated unfairly because of their differences and physical needs.*  *Employees and young people have the opportunity to seek redress if they feel they have been treated unfairly or have suffered victimisation.* |
| **Dignity** | *Employees and young people should take care to ensure that their behaviour supports and promotes and does not undermine a person’s self- respect regardless of people’s differences.*  *Everyone should be treated as a human being with due consideration given to their differences and prevailing circumstances.*  *Employees and young people’s records are kept confidential and only accessible to relevant employees.*  *Employees and young people are protected from discrimination and are treated with dignity.* |
| **Autonomy** | *Consideration is given to encourage everyone to develop a sense of independence as well as having control over their choices and wishes.*  *Employees and young people are encouraged to take an active part in decision making within the workplace and regarding the services they receive.*  *Young people’s views are incorporated into service provision and support is person centred.* |

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| **Appendix 5 – Reasonable adjustments Guidelines**  Guidelines are information intended to advise people on how something should  be done or what something should be. A guideline is a statement by which to determine a course of action by streamlining processes according to a set routine or sound practice.  SB logo (Black_Red) | |
| Name: | **Reasonable Adjustments Guidelines** |
| File No: | G12 |
| Version: | 1.1 (Draft) |
| Approved: | By the Board on |

|  |  |
| --- | --- |
| Guideline Custodian: | **EDI Officer** |
| Guideline Champion: (if applicable) | **Policy & Complaints Manager** |
| St Basils are committed to making sure our services can be easily accessed by individuals with disabilities and/or additional needs. This guidance does not aim to explain how we will approach every circumstance where a person with disabilities requires a service to be adjusted. It is a general statement of our commitment to ensure a person with disabilities is not at a disadvantage when accessing our services. The guidance is for both employees who work with us and for young people who access our services. It defines what a ‘reasonable adjustment’ is, in what type of circumstances they will be carried out and how a request for a reasonable adjustment can be made. St Basils is a Disability Confident Employer.  This guidance does not explain how we will approach every situation; it will do the following: -   1. Confirm our commitment to improving accessibility for all individuals. 2. Set out the principles of our commitment to provide reasonable adjustments for individuals who require them. 3. Details what factors we will consider when dealing with requests for reasonable adjustments. 4. Explain how individuals can appeal if they do not agree with St Basils decision relating to their circumstances.   Substantial disadvantage is defined in the Equality Act 2010 s.212(1) as ‘more than minoror trivial’.  **Definitions**  A reasonable adjustment is a legal term introduced under the Equality Act (2010). It means that we have a duty to make changes to make sure that, as far as possible, a disabled person has the same access to St Basils services and facilities as a non-disabled person. This may include, for example: Providing extra aids or services – for example providing information in alternative formats.  The Equality Act 2010  Under the Equality Act 2010 (The Act) a person is considered as having a disability if they have a physical or mental impairment that has a ‘substantial’ and ‘long term’ negative effect on their ability to carry out normal day-to-day activities. The Act provides a legislative framework to protect the rights of individuals and to advance equality of opportunity for all.  Under the Act, we have a legal duty to make adjustments in the following three circumstances:   * Where there is a provision, criterion or practice which puts a person with a disability at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled. * Where a physical feature puts a person with a disability at a substantial disadvantage in comparison with persons who are not disabled; and or * Where a person with a disability would, but for the provision of an auxiliary aid, be put at a substantial disadvantage in comparison with persons who are not disabled. | |

**1. What is a reasonable adjustment?**

1.1 A reasonable adjustment is a legal term described in the Equality Act (2010). It means that St Basils have a duty to make reasonable adjustments where its working practices (including policies and procedures) or physical premises put a disabled person at a substantial disadvantage in comparison with persons who are not disabled.

1.2 The Equality and Human Rights Commission suggests the following considerations when we decide whether an adjustment is ‘reasonable’ or not:

* + How effective the adjustment(s) will be in assisting a person with a disability and in preventing or reducing the possibility of them being at a disadvantage.
  + The practicality of St Basils making the adjustment(s);
  + The cost of the adjustment(s) and whether this is possible within St Basils resources; and
  + Any disruption to the service that making the adjustment(s) may cause.

1.3 In the circumstance where we are unable to make a reasonable adjustment due to cost or resources, we will work together with the person in question to find the most appropriate alternative solution for them.

**2. How to request a reasonable adjustment**

2.1 A reasonable adjustment can be requested from us in the following ways:

* + In writing, explaining what the adjustment is and why it is needed. This can be done by letter or email at [info@stbasils.org.uk](mailto:info@stbasils.org.uk)
  + By telephoning our Head Office – 0121 772 2483.
  + By referral from a local authority or other relevant agency.
  + By a family member when we have been given permission for them to do so; and or
  + A member of staff may suggest for one to be made, when they are aware it will support the young person’s needs.
  + Job applicants can inform us using the application form
  + Employees can contact their manager or a member of HR

2.2 In most cases we will be able to agree and deliver the required reasonable adjustment with a minimum of delay. However, in some cases it may be necessary for us to consider in more detail how best to overcome the difficulty a person with disabilities is experiencing and/or seek advice from expert disability organisations that can assist with signposting and other forms of support.

**3. Adjustments that will be considered**

3.1 As a registered provider of social housing, St Basils must demonstrate compliance with the Consumer Standards governed by the Social Housing (Regulation) Act 2023. The Transparency, Influence and Accountability Standard is of particular importance for reasonable adjustments as it is focussed on providing accessible services to tenants and requires landlords to understand their tenant’s individual needs to ensure services are designed to meet any individual needs.

3.2 St Basils is committed to maintaining a high standard of accessibility to our services for all individuals we come into contact with. We should therefore ensure our approach embraces all individuals who have a mental or physical impairment as defined by the act as follows:

***“If they have a physical or mental impairment and the impairment has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities (S6(1))”***

3.3 The following examples would be covered by this definition (this list is not exhaustive);

1. Providing additional support for individuals with communication or learning difficulties
2. Providing additional support for individuals who need it due to a physical or emotional infirmity, or those with mental health conditions
3. Providing additional support for individuals with sensory impairments, such as those which affect sight or hearing

3.4 In some instances, we may provide reasonable adjustments in circumstances which are not defined as a disability according to the Equality Act but will make services accessible to individuals with special need or circumstance.

3.5 Whilst it is not possible to list all such circumstances, below is a list of some examples:

1. Providing translation or interpreting services for individuals whose first language is not English.
2. Providing additional support for individuals with literacy problems.
3. Ensuring there is adequate wheelchair access to the workplace

**4. Keeping a record of a young person’s needs**

4.1 When a young person accesses a service, they will be asked whether they have any support needs and/or any communication preferences.

4.2 These will be recorded onto our internal systems and will be used to meet the young person’s specific needs throughout the duration of their time with us.

4.3 We will proactively check that we have the appropriate alerts and communication preferences recorded on our systems.

**5. Guidance for employees**

5.1 As a general rule, St Basils employees should adhere to the following approach.

1. **Ask – don’t assume**. Remember that many disabilities or special needs are not necessarily visible or obvious. Therefore, we should ask our young people routinely whether they need additional support. We don’t need to be intrusive –we should explain how we would normally deal with an issue the person has raised and then ask: “Do you need any additional support, for example because of a disability or other special circumstance?” That leaves the way open for the person to tell you as much or as little as he or she chooses about the circumstance whilst still requesting the support they need.
2. **Listen**. Most people with disabilities or special needs will know what support they need and will tell you how you can help them. Try to meet their request where it is reasonable to do so.
3. **Be flexible**.  People in similar sets of circumstances may have different ways of dealing with them – just because people have a similar disability, it does not mean that they will require the same support.

**6. Reasonable adjustments to our complaints process**

6.1 We will make reasonable adjustments to our complaints service where necessary, ensuring individuals with a disability are not at a disadvantage when accessing the service.

6.2 Examples of the reasonable adjustments we will make are:

* + Using the individual’s communication preference throughout the duration of the complaint;
  + We will not request a complaint to be made in writing where this presents a barrier or disadvantage to the individual due to their disability or additional needs;
  + Extension of any time limits (where it is lawful to do so); and
  + Provide information in alternative formats eg. large print or on coloured paper.

6.3 By adhering to the St Basils Equality, Diversity and Inclusion policy we will ensure our decision making is fair and does not present any barriers or disadvantage to individuals from any protected group (including disability) under the Equality Act 2010.

**7. Reasonable adjustments to our Lifeskills Programme**

7.1 We will make reasonable adjustments to our Lifeskills programme where this has been requested by a learner or identified by St Basils’ staff. These adjustments will be made to ensure that no learner experiences a substantial disadvantage as a result of a disability.

7.2 Reasonable adjustments will usually need to be requested before the assessment takes place (not to be confused with special considerations which are permitted post assessment).

7.3 St Basils has a Reasonable Adjustments & Special Considerations Policy in place which applies to the development, delivery and award of regulated qualifications. St Basils will make this policy available or proposes to make available to all young people. This policy applies to all learners who are St Basils residents and/or support service users.

7.4 Examples of the reasonable adjustments we will make are:

* Revising usual assessment arrangements, e.g., allowing a learner extra time to complete the assessment
* Adapting assessment materials, e.g. providing materials in braille
* Providing assistance during assessment, e.g. a sign language interpreter or a reader
* Reorganising the assessment room, e.g. removing adverse visual stimuli for an autistic learner
* Changing the assessment method, e.g. from a written assessment to a spoken assessment
* Using assistive technology, e.g. screen reading, or voice activated software
* Providing different coloured backgrounds to screens for onscreen assessments or using different coloured paper for paper-based assessments

7.5 In line with St Basils’ Equality, Diversity and Inclusion Policy, we will ensure that all decisions relating to reasonable adjustments are fair, inclusive and free from barriers or disadvantage.

**8. Appeals**

8.1 If an employee is dissatisfied with the arrangements or decisions, we have made regarding a reasonable adjustment they can use the grievance procedure to highlight this.

8.2 If an individual, who is not an employee, is dissatisfied with the arrangements or decisions we have made regarding a reasonable adjustment, we will respond in accordance with our Complaints Policy.

8.3 If necessary, when reviewing our decision, we will seek advice from specific expert disability groups.